

To: Eileen S. Stommes, Deputy Administrator
USDA-AMS-TM-NOP
Room 4007-So., Ag Stop 0275
P.O. Box 96456
Washington, DC 20090-6456.
Docket # TMD-94-00-2

From:

The USDA undermines the National Organic Standards Board's (NOSB's) authority in this draft of the proposed regulations. The USDA has ignored the clearly mandated authority the NOSB was given in the Organic Foods Production Act of 1990 to recommend the National List of Materials for organic practices. **Return control of the National List to the National Organic Standards Board.**

Loopholes were created when the U.S. Department of Agriculture (USDA) eliminated the carefully worded restrictions on the use of materials common to the current organic standards, replacing them with new terms such as "active" and "non-active" synthetics and ingredients. There is no historic or legal reason to create new terms. These loopholes will allow synthetic materials and ingredients in organic production that have never been allowed before. **Use the wording contained in the NOSB's recommendations regarding the National List.**

The definition of "organic" as written in the proposed national organic standards lacks the holistic approach central to organic practices. The proposed rules take a reductionist approach to organic food production that eliminates key concepts such as the health of the agro-ecosystem and biodiversity on the farm. **Use the definition of "organic" as written by the NOSB .**

Under the proposed rules, the authority to decertify growers, processors and manufacturers has been placed solely in the hands of the Secretary of Agriculture. As a result, there would be no efficient decertification process and therefore products not meeting organic requirements may remain on market shelves longer. Enforcement of certification standards, currently placed in the hands of private certifiers, may be weakened through what will inevitably be a lengthy bureaucratic process. **Return enforcement of certification to certifiers, and ensure organic integrity is maintained in the field.**

Under the proposed rule, previous usage of agricultural land will not be taken into consideration for certification. Under the proposal, if the land has been free of toxic chemicals for at least three years, it can be certified. Under this scenario, it would be possible for previously contaminated lands, such as Superfund sites to become certified organic. Current organic standards mandate that the complete history of the land be taken under consideration prior to granting certification. **Use the NOSB's recommendation for consideration of lands fit for organic production.**

Organic Standards must be maintained to protect consumers, not big business. There are no consumer groups lobbying for a weaker definition of organic!

Sincerely,